

# **SECTION 3**

## **QUALIFYING EVENTS ADMINISTRATION**

## Changes in Coverage

- All changes are permitted during Open Enrollment with the following exception:
  - an employee cannot drop a dependent child(ren) for whom he/she is required by a court order or administrative order to provide coverage.
- After Open Enrollment, an employee must experience a Qualifying Event (as listed in the Qualifying Event Chart) to add or drop dependents or, under appropriate circumstances, make other permitted changes. The health insurance application must be completed **no later than thirty (30) days following the Qualifying Event date** (date of marriage, divorce, employment, etc.) or sixty (60) days for newborns.
- As of April 1, 2003, a signed, notarized and properly dated ADD or DROP Letter (Refer to Appendix C-2 and C-3) will be used in lieu of certain supporting documentation with a Qualifying Event application. Refer to the chart below for the Qualifying Events that require Supporting Documentation:

Qualifying Event	Required Supporting Documents
Divorce/Legal Separation /Annulment	Filed decree signed by a judge and date-stamped "filed".
Adoption / Placement for adoption	Placements Papers or Final Adoption Papers from the Cabinet for Families and Children; or Signed and date-stamped "filed" papers from the Court.
Judgment, decree or Administrative Order relating to health coverage for the child.	A filed and dated court decree or Administrative Order.
Employee, spouse or dependent enrolled in employer's health plan becomes entitled to Medicare or Medicaid.	Copy of Medicaid/Medicare card; or Letter from the Medicaid/Medicare Office.
Loss of other group health insurance coverage that entitles employee or family member to be enrolled under HIPPA.	HIPAA certificate from prior carrier; Letter from employer/previous employer; or Termination letter from government agency under whom previous coverage was held.

**NOTE:** Carriers are not contractually required to issue a premium refund for a change transmitted after ninety (90) days from the Qualifying Event (with

the exception of death). Further, all premiums owed to the carrier must be paid. Do not adjust your billing to recoup premiums in this situation.

## **Court Orders or Administrative Orders**

If an employee is required by a court order or an administrative order to provide health insurance coverage for a dependent child, such child(ren) shall be ADDED to the plan. The employee is required to request the change no later than thirty (30) days from the “filed-stamped date” on the court order or the “notice” date on the administrative order.

If the employee fails to request the change no later than the thirty (30) days, the employee may have to purchase a private plan to cover the dependent child(ren) unless the order specifically states that health insurance coverage be provided through the “employer”. The Cabinet for Families and Children will send a copy of the administrative order to the insurance coordinator and to the employee.

## **Dropping Dependents**

Such child(ren) cannot be dropped from the plan (even during Open Enrollment) unless:

- there is a subsequent court order or administrative order no longer requiring coverage by the employee or group; or
- the child no longer meets the dependent eligibility requirements of the Public Employee Health Insurance Program.

A court order or an administrative order that permits the employee to drop a dependent child(ren) should be submitted no less than thirty (30) days of issue but will be accepted beyond the thirty (30) day rule. The employee must complete a health insurance application indicating the Qualifying Event and must provide the court order or administrative order dropping the dependent child(ren).

**NOTE:** If a court order or administrative order is received after thirty (30) days from the Qualifying Event date (notice date to drop dependent child(ren)), the employee will not be eligible to receive any premium refunds.

## **Custodial Parents**

Claims related information, I.D. cards and other coverage information will be sent directly to the custodial parent. The employee should complete the health insurance application providing the necessary custodial information to the carrier.

**NOTE:** For any event that impacts health insurance coverage for a court/administrative ordered dependent (termination, decrease in work hours, LWOP, etc.) the Insurance Coordinator must notify the custodial parent, the court issuing the order or the administrative agency issuing the notice. The following must be communicated in writing:

- name of dependent being terminated;
- date of termination; and
- reason dependent is being dropped.



## *Personnel Cabinet*

### *The Office of Public Employee Health Insurance*

#### *Permitted Mid-Year Election Changes*

**This chart reflects the mid-year election changes permitted in health insurance for the entire group and the changes permitted in the Health FSA and Dependent Care FSA for Commonwealth Choice participants.**

This chart describes the election changes that a cafeteria plan can permit employees to make during a period of coverage under the final cafeteria plan regulations issued in March 2000 and January 2001. Although some of the regulatory provisions are ambiguous, this chart reflects our views of permitted election changes, which are adopted for the Plan Year 2003. The only required mid-year election changes are those related to loss of eligibility (death, divorce, loss of dependency and age.)

Also note that pending future guidance, it appears employers can still rely on a 1989 proposed regulation (1.125-2, q&a-6 (e), renumbered as q&a-6(b)) to allow employees to drop cafeteria plan coverage mid-year if they remain out for the rest of the year.

<b>Event</b>	<b>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</b>	<b>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</b>	<b>Commonwealth Choice Dependent Care FSA</b>
<b>Change in Legal Marital Status</b>			
Marriage	<p>Add employee and/or spouse and dependents</p> <p>Or</p> <p>→→→</p> <p>-----</p> <p>-----</p> <p>Drop employee/dependents if person becomes covered under spouse's plan</p>	<p>Start or increase election</p> <p>Or</p> <p>→→→</p> <p>-----</p> <p>----- Decrease election if family members become covered under spouse's health plan (2)</p>	<p>Start or increase election if marriage increases dependent care expenses (3)</p> <p>Or</p> <p>-----</p> <p>-----</p> <p>Stop or decrease election if family elects dependent care assistance under spouse's plan or marriage decreases dependent care expenses (3)</p>
Divorce, legal separation, annulment	<p>Add employee and dependents (1) if event causes loss of coverage under spouse's plan,</p> <p>or</p> <p>-----</p> <p>-----</p> <p>Drop spouse; also drop family members added to former spouse's plan</p>	<p>Start or increase election if event causes loss of coverage under spouse's health plan (2)</p> <p>or</p> <p>Stop election and redirect the state contribution to health insurance if the event causes loss of other coverage for the employee</p> <p>or</p> <p>-----</p> <p>-----</p> <p>Decrease election</p>	<p>Start or increase election if event increases dependent care expenses (3) or causes loss of coverage under spouse's plan</p> <p>or</p> <p>-----</p> <p>-----</p> <p>Stop or decrease election if event decreases dependent care expenses (3)</p>
Spouse's death	<p>Add employee and any dependent who loses coverage under spouse's plan,</p>	<p>Start or increase election if death causes loss of coverage under spouse's health plan (2)</p> <p>or</p> <p>Stop election and redirect the</p>	<p>Start or increase election if death causes loss of coverage under spouse's plan or increases dependent care expenses (3)</p>

<b>Event</b>	<b>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</b>	<b>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</b>	<b>Commonwealth Choice Dependent Care FSA</b>
	<i>or</i> ----- ----- Drop spouse	state contribution to health insurance if the event causes loss of other coverage for the employee <i>or</i> ----- ----- Decrease election	<i>or</i> ----- ----- Stop or decrease election if death decreases dependent care expenses (3)
<b>Change in Number of Dependents</b>			
Number of employee's eligible dependents increases (by birth, adoption, or placement for adoption)	Add employee and/or spouse and/or other dependents (1)	Start or increase election	Start or increase election if employee has greater dependent care expenses
Number of employee's eligible dependents decreases (e.g., by death or because child becomes ineligible)	Drop affected dependent	Decrease election	Stop or decrease election if employee has reduced dependent care expenses
<b>Change in Employee's Employment Status</b>			
Employee terminates employment	Cease contributions	Cease contributions	Cease contributions
Employee is rehired less than 63 days after termination of employment	Reinstate prior election unless intervening status change event (9)	Reinstate prior election unless intervening status change event (9) <b>If employee did not elect COBRA during termination period, reinstatement of the prior coverage can be accomplished with one of the</b>	Reinstate prior election unless intervening status change event (9)

<i><b>Event</b></i>	<i><b>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</b></i>	<i><b>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</b></i>	<i><b>Commonwealth Choice Dependent Care FSA</b></i>
		<p>following methods (employee's choice):</p> <p><b>Proration:</b> Employee may elect to continue at the same monthly contribution as prior to the termination and the annual amount is reduced by the contributions missed during that period</p> <p><b>or</b></p> <p>Reinstatement: Employee may elect to makeup the shortfall resulting from the contributions missed during the terminated period</p>	
Employee is rehired more than 63 days after termination of employment	Make election to same extent permitted as new employee	<b>Make election to same extent permitted as new employee</b>	Make election to same extent permitted as new employee
Employee commences official leave without pay	Cease contributions	<b>Cease contributions</b>	Cease contributions
Employee returns from official leave without pay	<b>Reinstate prior election unless intervening status change event (9)</b>	<p>Reinstate prior election unless intervening status change event (9)</p> <p><b>Reinstatement of the prior coverage can be accomplished with one of the following methods (employee's choice):</b></p>	<p>Reinstate prior election</p> <p><i>or</i></p> <p>Change election if event changes dependent care expenses (3)</p>



<i><b>Event</b></i>	<i><b>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</b></i>	<i><b>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</b></i>	<i><b>Commonwealth Choice Dependent Care FSA</b></i>
		<p>Proration: Employee may elect to continue at the same monthly contribution as prior to the termination and the annual amount is reduced by the contributions missed during that period</p> <p><i>or</i></p> <p>Reinstatement: Employee may elect to makeup the shortfall resulting from the contributions missed during the terminated period</p>	
Employee begins unpaid FMLA leave (4) or Military Leave	<p>Cease contributions</p> <p><i>or</i></p> <p>Prepayment: Employee may increase election to prepay coverage contributions for FMLA leave period</p> <p><i>or</i></p> <p>Pay-as-you-go: Employee may make contributions on the same schedule as payments would have been made otherwise</p> <p><i>or</i></p>	<p><b>Cease contributions</b></p> <p><i>or</i></p> <p><b>Prepayment: Increase election to prepay coverage during leave</b></p> <p><i>or</i></p> <p>Pay-as-you-go: Employee may make contributions on the same schedule as payments would have been made otherwise</p>	<p>Decrease election if leave causes loss of coverage or decreases dependent care expenses (3)</p> <p><i>or</i></p> <p>Cease contributions</p>

<b><i>Event</i></b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
*NOTE: Employee may choose not to participate; otherwise they must choose one payment option or another	Catch-Up Option: If agreed to by both parties PRIOR to the FMLA leave, the employer may make contributions on behalf of the employee and may recoup the contributions upon the employee's return to employment		
Employee returns from unpaid FMLA leave (4) or Military Leave	<b>Reinstate prior election unless intervening status change event (9)</b>  NOTE: Employees returning from Military Leave are eligible for coverage immediately upon return or may delay the effective date until military coverage ends (employee's option)	<b>Employee must be able to reinstate prior coverage and can choose one of the following:</b>  <b>Proration: Employee may elect to continue at the same monthly contribution as prior to the FMLA and the annual amount is reduced by the contributions missed during the FMLA</b>  <b>or</b>  <b>Reinstatement: Employee may elect to makeup the shortfall resulting from the contributions missed during FMLA</b>	Generally same rights as employee returning from non-FMLA leave, though employee must be able to reinstate prior coverage

<b>Event</b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
Employee commences paid leave (assuming event does not affect eligibility for coverage)	No change	No change	Decrease election if event decreases dependent care expenses (3)
Employee returns from paid leave	No change unless intervening status change event (9)	No change unless intervening status change event (9)	Increase election if event increases dependent care expenses (3)
Employee changes worksite (out of service area)  *This is only applicable if the employee chose "work" county	<b>Make election changes that correspond with event</b>	No change	Decrease election if event decreases dependent care expenses (3) or Increase election if event increases dependent care expenses (3) (unless the care provider is a relative)
Other change in employee's employment status (e.g., switch from salaried to hourly status) that causes employee to cease eligibility under plan	<b>Cease contributions</b>	Cease contributions	Cease contributions
Other change in employee's employment status (e.g., switch from hourly to salaried status) that causes employee to become eligible for coverage under plan	Make elections as if a new employee, unless there was less than a 63-day break in eligibility.	Make elections as if a new employee	Make elections as if a new employee
<b><i>Change in Spouse or Dependent Employment Status (Dependent must continue to meet all eligibility requirements.)</i></b>			
Spouse or dependent terminates employment	<b>Add employee, spouse, and dependents (1) if event adversely affects eligibility for</b>	Start or increase election if event adversely affects eligibility for coverage under spouse's or	Start or increase election if event adversely affects eligibility for coverage under spouse's

<b>Event</b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
	coverage under spouse's or dependent's health plan	dependent's health plan (2)	dependent care assistance plan or Stop or decrease election if event decreases dependent care expenses (3)
Spouse or dependent commences employment	Drop employee, spouse, or dependent who becomes covered under spouse's or dependent's plan	<b>Decrease election if family becomes covered under health plan of spouse or dependent (2)</b>	Start or increase election if event increases dependent care expenses (3) or Stop or decrease election if family becomes covered under spouse's dependent care assistance plan
Spouse or dependent is out of work due to strike or lockout	Add employee, spouse, and dependents (1) if event adversely affects eligibility for coverage under health plan of spouse or dependent	Start or increase election if event adversely affects eligibility for coverage under spouse's or dependent's health plan (2)	Start or increase election if event adversely affects eligibility for coverage under spouse's dependent care assistance plan or Stop or decrease election if event decreases dependent care expenses (3)
<b>Spouse or dependent returns to work following cessation of strike or lockout</b>	Drop employee, spouse, or dependent who becomes covered under spouse's or dependent's health plan	Decrease election if family becomes covered under health plan of spouse or dependent (2)	Start or increase election if event increases dependent care expenses (3) or Stop or decrease election if family becomes covered under spouse's dependent care assistance plan
<b>Spouse or dependent commences unpaid leave (if the event adversely affects</b>	Add employee, spouse, and dependent (1)	Start or increase election if event adversely affects eligibility for coverage under spouse's or	Start or increase election if event adversely affects eligibility for coverage under spouse's

<b>Event</b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
eligibility for coverage under the spouse or dependent's plan)		dependent's health plan (2)	dependent care assistance plan or Stop or decrease election if event decreases dependent care expenses (3)
<b>Spouse or dependent returns from unpaid leave</b>	Drop employee, spouse, or dependent who becomes covered under spouse's or dependent's health plan	Decrease election if family becomes covered under spouse's or dependent's health plan (2)	Start or increase election if event increases dependent care expenses (3) or Stop or decrease election if family becomes covered under spouse's dependent care assistance plan
Other change in spouse's or dependent's employment status that causes spouse or dependent to cease to be eligible for coverage under spouse's or dependent's plan (e.g., switch from salaried to hourly status)	Add employee, spouse, and dependent (1)	Start or increase election (2)	Start or increase election if event adversely affects eligibility for coverage under spouse's plan (3)
Other change in employment status that causes spouse or dependent to gain eligibility for coverage under spouse's or dependent's plan (e.g., switch from hourly to salaried status)	Drop coverage for employee, spouse, or dependent who becomes covered under spouse's or dependent's plan	Decrease election if family members become covered under health plan of spouse or dependent (2)	Decrease election or <b>Increase election if event increases dependent care expenses (3)</b>
<b><i>Change in Dependent Eligibility</i></b>			
Dependent ceases to satisfy plan eligibility requirements on account of age, marriage or any	Drop coverage for dependent	Decrease election	Stop or decrease election if event decreases dependent care expenses (3)

<b>Event</b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
similar circumstance (support and maintenance)			
<b>Unmarried dependent re-establishes plan eligibility requirement (5) under applicable plan</b>	Add dependent who satisfies plan eligibility requirement	Start or increase election	Start or increase election if event increases dependent care expenses (3)
<b><i>Change in Residence</i></b>			
<b>Employee, spouse, or dependent changes primary (6) residence and becomes ineligible for current benefit election</b>	Make election change that corresponds with event	Make election change that corresponds with event	Make a corresponding election change if the child care provider changes
<b><i>Other Events</i></b>			
Loss of other group health insurance coverage that entitles employee or family member to be enrolled under HIPAA	Add employee (1)  or ----- -----Add spouse and/or dependent	Start or increase election or Stop election and redirect the state contribution if the event causes loss of other coverage for the employee or ----- -----Start or increase election	None
Judgment, decree, or administrative order relating to health coverage for child	Add child if required under order  or ----- ----- Drop child if other parent provides coverage under order	Start or increase election if order requires employee to provide child's health coverage or ----- ----- Decrease election if other parent covers child under order	None

<b>Event</b>	<b>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</b>	<b>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</b>	<b>Commonwealth Choice Dependent Care FSA</b>
Employee, spouse, or dependent enrolled in employer's health plan becomes entitled to Medicare or Medicaid	Make an election change that corresponds to the event	Decrease election	None
Employee, spouse, or dependent loses entitlement to Medicare, Medicaid, KCHIP, any governmental group health insurance coverage	Commence or increase coverage of that employee, spouse, or dependent	Start or increase election	None
<b>Cost or Coverage Changes (8)</b>			
<i>Change in Cost</i>			
Benefit option has significant increase or decrease in cost			Make a corresponding change (increase or decrease). Increasing the election for a day care provider raising rates mid-year is only permitted if the provider is not a relative of the employee
<b>Change In Coverage Under Another Employer Plan</b>			
Employee's spouse makes elections during an open enrollment period that differs from the open enrollment period of the employer (7)  ----- ----- Employee makes elections during an open enrollment period of another employer that differs from the open enrollment period of the employer (7)	Employee can make election change that "corresponds" with spouse's election change  ----- ----- Employee can make election change that corresponds with the elections made with the other employer's plan  -----	<i>After Open Enrollment and before 12/31</i> Employee may make corresponding change (and redirect state contribution)  <i>After 12/31 - None</i> ----- <i>After Open Enrollment and before 12/31</i> Employee may make corresponding change (and redirect state contribution)	Employee can make election change that "corresponds" with election change under the other employer plan

<b>Event</b>	<b><i>Accident or Health Plan Covering Expenses of Employee, Spouse, Eligible Dependents</i></b>	<b><i>Commonwealth Choice Health FSA Covering Expenses of Employee, Spouse, Dependents</i></b>	<b><i>Commonwealth Choice Dependent Care FSA</i></b>
----- ----- Retiree makes elections during an open enrollment period of a state sponsored retirement system that differs from the open enrollment period of the employer	-----Retiree can make an election change that corresponds with the elections made with the retirement system plan	After 12/31 – None ----- None	
Individual changes election for any other event that is permitted under regulation (and terms of the employer plan)	Employee can make election change that “corresponds” with election change	None	Employee can make election change that “corresponds” with election change

**Permitted Election Changes**

End Notes:

- (1) The final regulation preamble indicates that dependents who can be added are those who were directly affected by the status change event plus other dependents (the so-called “tag-along” rule). However, the examples in the regulation only explicitly deal with situations where an employee elects family coverage and adds family members at no additional cost. It is not clear, but IRS staff members have informally stated that the “tag-along” rule applies even if the employee must increase an election to add additional dependents. Also, the preamble and examples in the regulation indicate that the “tag-along” rule applies to HIPAA events and situations where a spouse terminates employment; it is not clear what other events might be covered by the “tag-along” rule.
- (2) It appears this rule does not require that a spouse’s coverage include a Health FSA.
- (3) By an increase or decrease in dependent care expenses, we mean that the event increases or decreases the amount of expenses that an employee can have reimbursed on a tax-free basis under Code section 129 from a dependent care assistance plan. For example, if the employee gets married and his or her spouse does not work outside the home, the spouse would be available to care for a child, and thus the employee may not be able to claim that dependent care expenses are being used to enable the employee to be gainfully employed — a condition that must be satisfied for the expense to be reimbursed on a tax-free basis under Code section 129. Conversely, the marriage can increase the amount of expenses reimbursable under the dependent care assistance plan if, for example, a new spouse or stepchild is a “qualifying individual” for



whom dependent care assistance can be received. A spouse's death or divorce might lead to fewer dependent care expenses eligible for reimbursement under section 129 if, for example, the spouse was a "qualifying individual." Conversely, if the spouse was not employed outside the home, the death or divorce might require the employee to pay for a caregiver in order to remain gainfully employed, and therefore the expenses may be reimbursed on a tax-free basis under section 129.

- (4) Most employees are entitled to certain rights under the Family and Medical Leave Act (FMLA), whether or not the benefits are provided through a cafeteria plan. Employees generally must receive up to 12 weeks of unpaid FMLA leave, although the employee or employer generally can choose to substitute available paid leave for unpaid leave. During FMLA leave, the employer must maintain group health coverage (including FSA coverage) on the same conditions as coverage would be provided if the employee had not taken the leave. An employee's entitlement to other benefits during FMLA leave is determined by the employer's established policy for providing such benefits when the employee is on other forms of paid or unpaid leave (as appropriate). If benefits are continued during unpaid leave, proposed IRS regulations allow benefits purchased through a cafeteria plan to be paid in several ways, including increased salary reductions before the leave to prepay benefits or using salary reductions after the leave to "catch-up" on payments. Benefits continued on paid FMLA leave are paid for in the same manner as during any paid leave. Employees can choose to drop benefits while on leave, but FMLA requires they have the right to be reinstated upon return from leave.
- (5) For purposes of eligibility in this plan, a divorced dependent is not an "unmarried" dependent.
- (6) Primary residence is the official residence claimed for tax purposes.
- (7) Military Insurance Coverage, which does not include Veteran's Administration benefits, is considered "Another Employer Plan".
- (8) "Cost or Coverage Changes Under the Employer's Plan" are not included in this chart. In the event there is a mid-year change in the Commonwealth's plan(s), specific direction will be provided to the group or groups affected.
- (9) The same status change rules apply – an employee must request the mid-year election change within the required time limits for such requests (30 days from the event except for adding a newborn (only), which is 60 days).

**Effective Dates**

Effective dates for the various mid-year election changes are as follows:

A. Events increasing coverage

- 1. Birth, adoption, placement for adoption = date of the event;
- 2. Marriage, loss of other coverage, court or administrative orders for dependent(s) or foster child(ren), expiration of COBRA = 1<sup>st</sup> day 1<sup>st</sup> month from the employee signature date.
- 3. Different Open Enrollment = 1<sup>st</sup> day 1<sup>st</sup> month

B. Events decreasing coverage

1. Death = date of the event.
2. Divorce, loss of dependent status or moving out of the service area = End of the month of loss of eligibility.
3. Gaining other health insurance coverage (Medicare/Medicaid/Tricare/etc.) = End of the month from the employee's signature date.
4. Different Open Enrollment = End of the month from the employee's signature date.

The application is not to be signed BEFORE the Qualifying Event date, EXCEPT for loss of other coverage.

NOTE: No option changes (A to B, B to A, etc.) are permitted when adding and dropping dependents.